KEVIN G. HORBATIUK (KGH-4977) RUSSO, KEANE & TONER, LLP Attorneys for Defendant CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC. 26 Broadway - 28th Floor New York, New York 10004 (212) 482-0001

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE COMBINED WORLD TRADE CENTER AND LOWER MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

LUIS MORAN (AND WIFE, KETTY MORAN),

100 CHURCH, LLC, 120 BROADWAY

**DOCKET NO:** 08 CV 2243

Plaintiffs,

-against-

CONDOMINIUM (CONDO #871), 120 **BROADWAY HOLDINGS, LLC, 120** BROADWAY PROPERTIES, LLC, 120 BROADWAY LLC., 222 BROADWAY, LLC, ALAN KASMAN DBA KASCO, AMBIENT GROUP, INC., AMERICAN EXPRESS BANK, LTD., AMERICAN EXPRESS COMPANY. AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., ANN TAYLOR STORES CORPORATION, BATTERY PARK CITY AUTHORITY, BFP ONE LIBERTY PLAZA CO., LLC., BFP TOWER C CO., LLC, BFP TOWER C MM LLC, BLACKMON-MOORING STEAMATIC CATASTOPHE, INC., d/b/a BMS CAT, BOARD OF MANAGERS OF THE 120 BROADWAY CONDOMINIUM (CONDO #871), BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDING, INC CHASE MANHATTAN BANK CORPORATION.

NOTICE OF APPEARANCE CITIBANK, NA. CUNNINGHAM DUCT CLEANING CO., CUSHMAN & WAKEFIELD, INC., ENVIROTECH CLEAN AIR, INC., GENERAL RE SERVICES CORP., GPS ENVIRONMENTAL CONSULTANTS, INC., HILLMAN ENVIRONMENTAL GROUP, LLC INDOOR ENVIRONMENTAL TECHNOLOGY, INC., KASKO RESTORATION SERVICES CO., LAW ENGINEERING, P.C., LEHMAN BROTHERS, INC., LEHMAN COMMERCIAL PAPER, INC., MERRILL LYNCH & CO., INC., NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEW LIBERTY PLAZA LP., NEW YORK CITY INDUSTRIAL DEVELOPMENT. AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE LIBERTY PLAZA, ROYAL AND SUNALLIANCE INSURANCE GROUP, PLC, SILVERSTEIN PROPERTIES, INC., STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., THE BOARD OF MANAGERS OF ONE LIBERTY PLAZA CONDOMINIUM (CONDO # 1178), THE CITY UNIVERSITY OF NEW YORK. THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), TOSCORP INC., TRAMELL CROW COMPANY, TRAMELL CROW CORPORATE SERVICES, INC., TRC ENGINEERS, INC., TUCKER ANTHONY, INC, UBS FINANCIAL SERVICES, INC., f/k/a SWISS BANK CORPORATION, VERIZON NEW YORK. INC., WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA CO. GP, CORP., WFP RETAIL CO. G.P. CORP., WFP RETAIL CO. L.P., WFP TOWER A CO., L.P., WFP TOWER B CO., G.P. CORP. WFP TOWER B HOLDING CO. L.P. WFP TOWER B CO., L.P., WFP TOWER D CO. G.P. CORP., WFP TOWER D HOLDING CO. I L.P., WFP TOWER D HOLDING CO., II L.P., WFP TOWER D HOLDING I G.P., CORP.,

## WFP TOWER D CO., L.P., WORLD FINANCIAL PROPERTIES, L.P., and ZAR REALTY MANAGEMENT CORP., ET AL

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To the Clerk of this Court and all parties of record:

Enter my appearance as counsel in this case for:

## CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC.

I certify that I am admitted to practice in this court.

Dated: New York, New York

April 3, 2008

Kevin G. Horbatiuk

Kevin G. Horbatiuk (KGH4977)

Attorneys for Defendant

CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO.,

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TO: CHRISTOPHER R. LaPOLA, ESQ.,

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## **CERTIFICATION OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 3<sup>rd</sup> day of April, 2008.

CHRISTOPHER R. LaPOLA, ESQ., WORBY GRONER EDELMAN & NAPOLI BERN, LLP Attorney for Plaintiffs LUIS MORAN (AND WIFE, KETTY MORAN), 115 Broadway 12th Floor New York, New York 10006

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